

Exhibit A

Department of Workforce Development
Equal Rights Division
819 N. 6th Street, Rm. 723
Milwaukee, WI 53203-7997
Telephone: (414) 227-4384
Fax: (414) 227-4084
TTY: (414) 227-4081



Scott Walker, Governor
Raymond Allen, Secretary

March 09, 2018

NOTICE OF COMPLAINT
PUBLIC ACCOMMODATIONS OR AMUSEMENTS

FRANCISCO MIMO-LANNOY
3308 N MANOR DR
LANSING IL 60438
Complainant

vs.

ST CATHERINE'S MEDICAL CENTER CAMPUS
9555 76TH ST
PLEASANT PRAIRIE WI 53158
Respondent

ERD Case No.: CR201800658

TO THE RESPONDENT:

Enclosed is a copy of a complaint filed with this Department alleging a violation of the Wisconsin Public Accommodate or Amusement Law, sec.106.52 Stats.

The Department of Workforce Development is authorized by statute to investigate this complaint. To begin the investigation, we request that you provide a written response within 20 calendars days of the date of this letter. This is your opportunity to present the facts that you believe should be considered, as well as to raise any objections you have regarding jurisdiction or the timeliness of the complaint. Include all information that documents your position. Failure to provide your position statement within 20 calendars days of the date of this letter may be taken to indicate that you do not dispute the allegations in the complaint. Please send a copy of all correspondence to the Complainant and to the Complainant's attorney, if know.

If you are interested in discussing early resolution of this dispute, please notify me as soon as possible and I will refer this case to an Administrative Law Judge/Mediator. An early resolution of this case will result in a substantial savings of the time and expense typically involved in the investigation and hearing process. If you choose mediation, you are not required to file a written response to the complaint at this time.

TO THE COMPLAINANT:

I will contact you if the Respondent expresses an interest in mediation. If that does not occur, I will investigate the issues raised in the complaint. I will contact you as soon as possible after the 20-day deadline with specific questions regarding your complaint. Thank you for your patience.

The Department of Workforce Development does not discriminate on the basis of disability in the provision of services or in employment. If you need this printed material interpreted or in a different form, or if you need assistance in using this service, please contact us.

Please direct all correspondence or inquiries regarding this matter to:

Nicole R Guardiola, Equal Rights Officer
819 N 6th St
ROOM 723
MILWAUKEE WI 53203-1687

414-227-5016
nicole.guardiola@dwd.wisconsin.gov

Enclosure(s)

cc:
FRANCISCO MIMO-LANNOY
3308 N MANOR DR
LANSING IL 60438

ST CATHERINE'S MEDICAL CENTER CAMPUS
9555 76TH ST
PLEASANT PRAIRIE WI 53158

**Discrimination Complaint
Public Accommodation or Amusement**

To be completed
by ERD.
ERD Case #

CR **2018-00658**
For Office Use

Important!! Please Read All Of The Instructions On Page 3 Before Starting

Personal information you provide may be used for secondary purposes. [Privacy Law, s. 15.04(1)(m) Wisconsin Statutes]

1. Complainant Information *NG*

Last Name Mimo-Lannoy	First Name Steven Francisco	Initial
Street Address 3308 N Manor Dr		
City Jansing	State IL	Zip Code 60138
Home Telephone Number 917-402-4924		
Work Telephone Number () -		

2. Respondent Information

Respondent name St Catherine Medical Center		
Street Address 9555 76th St		
City Pleasant Prairie	State WI	Zip Code 53158
Respondent Telephone Number 262-577-8000		

3. Your complaint may be filed with another agency unless you check "no" below.

☒ Yes See #3, in the instructions page, for more details.

☐ No

4. County in which the discrimination occurred?

Name of County:

Kenosha

5. BASIS: You must list a basis for your complaint. (For example: "sex-female", "race-African American", "disability-visual impairment", "sexual orientation-homosexual". (See page three for complete listing of bases).

What is the basis for your complaint?

Sexual orientation in a public facility
Please go on to the next page

RECEIVED
2018 MAR -2 AM 9:43
DWD
EQUAL RIGHTS DIVISION

NG

6. **STATEMENT:** What did the respondent do? List each action you believe was discriminatory. (For example: I was denied access or service, charged a higher than regular rate, etc.) Then, say why you believe you were treated differently because of the basis you listed above.

On Jan 14, 2018 I Francisco MIMO-LANNOY was taken into the ER by ambulance, when I got there I asked if they could let in my husband at the room I was placed at.

They said they were going to check in the waiting area.

My husband Steven also asked the receptionist Danielle, to be taken into the room where I was, she gave him some lame excuse about the size of the room being too small, after over 30 mins of my husband seeing how heterosexual couples were allowed to go in together, he raised hell to be let in, a nurse

7. **DATES:** (month/day/year) from the ER had to intervene → see page

When did the above action(s) first happen?

01/14/2018

On what date did it last happen?

01/14/2018

8. I hereby certify that the information I have provided on this form is true to the best of my knowledge.

I understand that I must cooperate as required by the Equal Rights Division, and it is my responsibility to provide sufficient information to prove the claim is true. This complaint is an open record and may be provided to the employer or others under the provisions of Wisconsin's Open Records Law. Wisconsin law prohibits retaliatory action by an employer for most complaints filed with the Department. I understand there is no guarantee that the Equal Rights Division will accept my claim, and no guarantee that it will be able to collect upon it.

Signature of Complainant or Authorized Representative

Date Signed (month, day, year)

02/28/2018

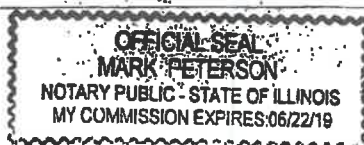
Sworn To Before Me On (month, day, year)

My Commission Expires (month, day, year)

2-28-2018

6-22-19

Notary Public Signature (affix seal)



My husband was finally allowed to join me to find out I was in a room so big it even had its private bathroom (Room 5) in the ER.

We refuse to be treated less than any other citizen, just because someone may have a problem with it.

The law is very clear, a hospital is a public place and cannot discriminate against people based on their sexual orientation.

We demand a prompt investigation and resolution to a very unpleasant and illegal way of conducting business.

Department of Workforce Development
Equal Rights Division
P.O. Box 7997
Madison, WI 53707-7997
Telephone: (414) 227-4384
Fax: (414) 227-4084
TTY: (414) 227-4081



Scott Walker, Governor
Raymond Allen, Secretary

SEP 21 2018

NOTICE OF DISMISSAL

Francisco Mimo Lannoy
3308 N Manor Dr
Lansing, IL 60438
Complainant

vs.

ERD Case No: CR201800658

St. Catherine's Medical Center Campus
9555 76th St
Pleasant Prairie, WI 53158
Respondent

A complaint having been filed with the Equal Rights Division on March 2, 2018 alleging a violation of the Wisconsin Public Accommodations Law on the basis of sexual orientation; and the Equal Rights Division having been fully informed and having no objection; now

ORDERS

The complaint to be dismissed for the reason indicated below.

The Complainant has requested the withdrawal of his complaint by his signature on September 15, 2018. The Complainant is pursuing the matter in federal court.

Nicole Guardiola
Equal Rights Officer

Cc: Complainant
Respondent, Attn: Tom Kelley

Street Address

819 N. 6th Street, Rm. 723

Milwaukee, WI 53203

Telephone: (414) 227-4384

Fax: (414) 227-4084

Mailing Address

PO Box 7997

Madison, WI 53707



Tony Evers, Governor
Caleb Frostman, Secretary

DATED AND MAILED FEB 20 2019

Francisco Mimo-Lannoy

3308 N. Manor Rd.

Lansin, IL 60438

Complainant

ELL

PRELIMINARY DETERMINATION
AND ORDER

VS.

ERD Case No. CR201803059

Froedtert South, Inc.

6308 8th Ave.

Kenosha, WI 53143

Respondent

I. THE DIVISION DECIDED:

It does not have jurisdiction under the Wisconsin Public Accommodations Law, sec. 116.54, Stats.

II. THIS MEANS:

The complaint is dismissed.

III. THE NEXT STEP IS:

The dismissal will become final unless written appeal is received by the Equal Rights Division, P.O. Box 7997, Madison, WI 53707-7997, within 20 days of the date this determination was mailed. (The DATE OF MAILING is stamped at the top of the Preliminary Determination.) The appeal must state the specific reasons why you are appealing.

IV. THE DIVISION DECIDED THERE WAS NO JURISDICTION BECAUSE:

- A. The Complainant filed a complaint with the Division on March 2, 2018, against St. Catherine's Medical Center Campus ("St. Catherine's") alleging discrimination in public accommodations based on sexual orientation (CR201800658). The Complainant specifically alleged that, on January 14, 2018, St. Catherine's temporarily barred his husband from seeing him in the emergency room, thereby discriminating against him based on his sexual orientation. That complaint was withdrawn by the Complainant so that he could pursue his claims in federal court and was dismissed by the Division on September 21, 2018.
- B. The Complainant filed this complaint against the Respondent on November 13, 2018, alleging the same claims made in his earlier complaint against St. Catherine's. St. Catherine's is owned and operated by the respondent.

V. INVESTIGATOR'S EXPLANATION:

- A. This complaint duplicates the claims made in case number CR201800658, which has already been dismissed by the Division. As these claims are both duplicating previously filed claims and the Complainant has already withdrawn those claims before the Division, the Division does not have any jurisdiction to investigate the claims made in this complaint. There is no evidence that the respondent named in this complaint is separate from the respondent named in the earlier complaint.

Johnnie A. Nelson
Equal Rights Officer

cc: Complainant
Respondent
Stephanie A. Cantrell, attorney for the Respondent

March 4, 2019

NOTICE OF DISMISSAL

FRANCISCO JOSE MIMO-LANNOY
3308 N MANOR DR
LANSING IL 60438
Complainant

vs.

FROEDTERT SOUTH INC
6308 8TH AVE
KENOSHA WI 53143
Respondent

Re: ERD Case No.: CR201803059

A complaint was filed with the Equal Rights Division (ERD) on November 13, 2018, alleging discrimination based on sexual orientation. The ERD now

ORDERS

The complaint is dismissed for the reason indicated below:

The Complainant has requested that the complaint be withdrawn by his signature on January 24, 2019.

Sincerely,
Civil Rights Bureau

Heidi Marshall
Program Assistant Supervisor

cc: Complainant
Respondent
Stephanie A. Cantrell, Attorney for Respondent